

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

Hon. Claire C. Cecchi

MATTHEW BRENT GOETTSCHKE,
[DEFENDANT TWO REDACTED],
JOBADIAH SINCLAIR WEEKS,
JOSEPH FRANK ABEL, and
SILVIU CATALIN BALACI

CRIMINAL NO.: 19-cr-877-CCC

**DEFENDANT JOBADIAH SINCLAIR WEEKS' *UNOPPOSED* MOTION
FOR LEAVE TO REPLY TO GOVERNMENT'S OPPOSITION
TO DEFENDANT WEEKS' MOTION TO REVOKE
PRETRIAL DETENTION, REQUEST FOR ENLARGEMENT
OF PAGE LIMIT, AND INCORPORATED MEMORANDUM OF LAW**

Pursuant to Local Rule 7.1(d)(3), Defendant Jobadiah Sinclair Weeks moves for leave to file a Reply of no more than 20 pages to the Government's Opposition to Defendant Weeks' Motion to Revoke Pretrial Detention ("Opposition"). (D.E. 24). The Reply will rebut new evidence presented in the Opposition and aid the Court in the resolution of Mr. Weeks' pending Motion for Revocation of Pretrial Detention Order. (D.E. 12). The Government does not oppose this motion.

A Reply is necessary for two reasons. First, Mr. Weeks filed a 15-page motion to revoke his pretrial detention order. The Government filed a 32-page Opposition. A Reply of no more than 20 pages will offer the parties close to the same number of pages to support their respective positions regarding pretrial release.

Second, the Government offers evidence in the Opposition not raised in the original proceeding. For example, the Government offers approximately 12 pages and two exhibits of

additional evidence, including emails and messages related to Mr. Weeks' perceived role in the charged offenses. A Reply provides the appropriate opportunity for Mr. Weeks to respond to this new evidence.

For the foregoing reasons, Mr. Weeks respectfully files this unopposed motion for leave to file a Reply of no more than 20 pages to address the Opposition, and for such other relief as the Court deems proper. The Reply will be filed at least seven days prior to the motion day, currently scheduled for February 10, 2020 at 2:00 PM.

DATED: January 24, 2020

CARLTON FIELDS

/s/ Simon Gaugush

Simon Gaugush, Esq.

Michael L. Yaeger, Esq.

Andrew M. Hinkes, Esq.

Adam P. Schwartz, Esq.

Attorney ID No. 018351995

CARLTON FIELDS

4221 W. Boy Scout Blvd., Ste. 1000

Tampa, FL 33607

Telephone: 813.223.7000 (Fla.)

Facsimile: 813.229.4133 (Fla.)

and

180 Park Avenue, Ste. 106

Florham Park, NJ 07932-1054

Telephone: 973.828.2600

Facsimile: 973.828.2601

*Counsel for Defendant Jobadiah Sinclair
Weeks*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 24, 2020, I filed the foregoing with the Clerk of Court using the Court's CM/ECF system, which will serve an electronic copy to all counsel of record.

/s/ Simon Gaugush